

JMK: WMP/ALC/LHE/SME  
F: #2016R00505

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
UNITED STATES OF AMERICA,

*Plaintiff,*

- against -

MARK NORDLICHT,  
DAVID LEVY,  
URI LANDESMAN,  
JOSEPH SANFILIPPO,  
JOSEPH MANN,  
DANIEL SMALL and  
JEFFREY SHULSE,

**DECLARATION**  
16 CR 640 (DLI)

*Defendants.*

-----X

**DECLARATION OF SUZANNE P. POPE, ESQ.**  
**IN SUPPORT OF MR. SANFILIPPO'S MEMORANDUM IN OPPOSITION TO THE**  
**GOVERNMENT'S MOTION TO DISQUALIFY HIS COUNSEL OF CHOICE**

I, Suzanne P. Pope, pursuant to 28 U.S.C. § 1746, declare as follows:

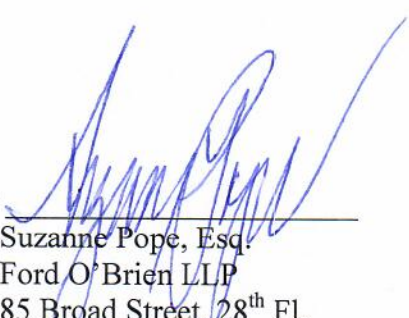
1. I am Special Counsel at Ford O'Brien LLP and I submit this declaration in support of Mr. SanFilippo's Memorandum in Opposition to the Government's Motion to Disqualify Kevin O'Brien from representing him. I have first-hand knowledge of the matters set forth below, except where otherwise indicated.
2. I worked closely with Mr. O'Brien in his representation of Mr. SanFilippo and Mr. Mann and we both interacted far more frequently with Mr. SanFilippo. In fact, our contact with Mr. Mann was minimal since the Government did not appear to have any interest in Mr. Mann, even as a witness.

3. Subsequent to our introductory meeting in July 2016, I did not see Mr. Mann again until just prior to his arraignment in December 2016. Our introductory meeting was two hours at most and a segment of the meeting was about matters not subject to the attorney-client privilege. During the period between July and December 2016 I had a few non-substantive conversations with Mr. Mann primarily regarding billing issues.

4. To my knowledge Mr. Ford, a partner at Ford O'Brien, LLP, had no contact with Mr. SanFilippo or Mr. Mann prior to December 19<sup>th</sup>, when they were both arraigned. Additionally, prior to their arraignment, I had no oral or written communication with Mr. Ford about either Mr. SanFilippo or Mr. Mann. Subsequent to arraignment, my only conversations with Mr. Ford about Mr. Mann were concerning my efforts to locate replacement counsel for Mr. Mann.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: February 1, 2017  
New York, NY

By:   
Suzanne Pope, Esq.  
Ford O'Brien LLP  
85 Broad Street, 28<sup>th</sup> Fl.  
New York City, NY 10004  
(212) 858-0040  
[aford@fordobrien.com](mailto:aford@fordobrien.com)